

WILMER CUTLER PICKERING  
HALE AND DORR LLP

SONAL N. MEHTA (SBN 222086)  
[Sonal.Mehta@wilmerhale.com](mailto:Sonal.Mehta@wilmerhale.com)  
2600 El Camino Real, Suite 400  
Palo Alto, California 94306  
Telephone: (650) 858-6000

DAVID Z. GRINGER (*pro hac vice* forthcoming)  
David.Gringer@wilmerhale.com  
7 World Trade Center  
250 Greenwich Street  
New York, New York 10007  
Telephone: (212) 230-8800

*Attorneys for Defendant Coinbase Global, Inc.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

BIT GLOBAL DIGITAL LIMITED,  
Plaintiff,  
v.  
COINBASE GLOBAL, INC.,  
Defendant

Case No. 3:24-cv-09019-AMO

**DEFENDANT COINBASE GLOBAL,  
INC.'S NOTICE OF INTENT TO  
OPPOSE *EX PARTE* EMERGENCY  
MOTION FOR TEMPORARY  
RESTRAINING ORDER AND  
PRELIMINARY INJUNCTION**

On August 9, 2024, it was announced that Plaintiff BiT Global would assume custodian services for the Bitcoin underlying wBTC in a “strategic partnership between BitGo, Justin Sun, and the Tron ecosystem.”<sup>1</sup> Mr. Sun has a checkered history, including allegations of fraud and misleading investors in both China and the United States.<sup>2</sup>

After a review of Plaintiff's operations, as the Complaint itself alleges, on November 19, 2024, Coinbase publicly announced that it "will suspend trading for wBTC (wBTC) on December 19, 2024, on or around 12pm ET."<sup>3</sup> Plaintiff waited nearly four weeks, until December 13, 2024, to file the instant action and seek a temporary restraining order and preliminary injunction. Coinbase respectfully submits that Plaintiff's motion should be denied on that basis alone, even apart from its numerous other failings.

If the Court intends to hear the motion, Coinbase respectfully requests that the Court set the following schedule:

- Deadline for Coinbase's opposition: Wednesday, December 18, 2024 at 3 p.m. PT.
- Plaintiff shall not be permitted a reply.
- Hearing: Thursday, December 19, 2024 at 2 p.m. PT (on the Court's civil law and motion calendar), or as soon thereafter as convenient for the Court.

Dated: December 13, 2024

Respectfully submitted,

By: /s/ Sonal N. Mehta  
SONAL N. MEHTA (SBN 222086)

*Attorney for Defendant Coinbase Global, Inc.*

<sup>1</sup> <https://blog.bitgo.com/bitgo-to-move-wbtc-to-multi-jurisdictional-custody-to-accelerate-global-expansion-plan-2ea0623fa2c8>.

<sup>2</sup> <https://www.cryptotimes.io/2024/08/13/justin-suns-wbtc-involvement-sparks-concern-among-community/>; <https://www.theverge.com/c/22947663/justin-sun-tron-cryptocurrency-poloniex>.

<sup>3</sup> <https://x.com/CoinbaseAssets/status/1858921827159945638>.